

EXHIBIT 40

From: Obi, Shawn R. <SObi@winston.com>
Sent: Thursday, August 22, 2019 2:39 PM
To: Linda Lam; Michael Schrag; Joshua Bloomfield; Rick Paul; Ashlea Schwarz; Laura Fellows
Cc: Groves, Amanda; Brinson, Kobi Kennedy; Knight, Stacie C.
Subject: Hernandez et al. v. Wells Fargo
Attachments: 8.22.19_WFB NA SUPPLEMENTARY Responses to First Set of Rogs.pdf

Counsel,

Please see the attached, which was also served today via U.S. Mail.

- **WELLS FARGO BANK, N.A.'S SUPPLEMENTARY RESPONSES TO PLAINTIFF'S FIRST SET OF INTERROGATORIES**

Further to Michael's request, below is an updated state-by-state breakdown, which is based on the excel document produced during Ms. Bell's deposition.

AL	7	0.7%
AR	9	1.0%
AZ	7	0.7%
CA	31	3.3%
CO	7	0.7%
CT	18	1.9%
DC	1	0.1%
DE	6	0.6%
FL	115	12.2%
GA	28	3.0%
HI	1	0.1%
IA	18	1.9%
ID	7	0.7%
IL	45	4.8%
IN	16	1.7%
KS	5	0.5%
KY	21	2.2%
LA	34	3.6%
MA	13	1.4%
MD	40	4.2%
ME	6	0.6%
MI	11	1.2%
MN	8	0.8%
MO	5	0.5%
MS	2	0.2%
MT	1	0.1%
NC	21	2.2%

ND	1	0.1%
NE	4	0.4%
NH	5	0.5%
NJ	70	7.4%
NM	9	1.0%
NV	9	1.0%
NY	69	7.3%
OH	69	7.3%
OK	11	1.2%
OR	7	0.7%
PA	93	9.8%
RI	5	0.5%
SC	23	2.4%
SD	3	0.3%
TN	7	0.7%
TX	37	3.9%
UT	3	0.3%
VA	12	1.3%
VT	1	0.1%
WA	14	1.5%
WI	11	1.2%

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